

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST by and through MARIELLE SHAVONNE SMITH and CHARIS HUMPHREY on behalf of its members; SHAKETA REDDEN; DORETHEA FRANKLIN; TANIQUA SIMMONS; DE'JON HALL; JOSEPH BONDS; CHARLES PALMER; SHIRLEY SARMIENTO; EBONY YELDON; and JANE DOE, individually and on behalf of a class of all others similarly situated;

Plaintiffs,

v.

Civil No.: 1:18-cv-00719-CCR

CITY OF BUFFALO, NY; BYRON B. BROWN, Mayor of the City of Buffalo, in his individual and official capacities; BYRON C. LOCKWOOD, Commissioner of the Buffalo Police Department, in his individual and official capacities; DANIEL DERENDA, former Commissioner of the Buffalo Police Department, in his individual capacity; AARON YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI, ROBBIN THOMAS, UNKNOWN SUPERVISORY PERSONNEL 1-10, UNKNOWN OFFICERS 1-20, each officers of the Buffalo Police Department, in their individual capacities.

Defendants.

**STIPULATED MOTION FOR ADJOURNMENT
OF DEADLINES IN CASE MANAGEMENT ORDER**

The Parties respectfully move to amend certain deadlines the case management order. In support of the motion, the Parties state as follows:

1. The Parties have previously informed the Court that elements of Plaintiffs' requests for GIVE Grant materials remain unproduced. *See* ECF No. 248. These materials

specifically include voluminous body camera footage associated with individual traffic stops executed by the BPD since January 1, 2024.

2. Plaintiffs have further requested supplemental production of Internal Affairs records which, in Plaintiffs' view, are relevant to Plaintiffs' claims, responsive to Plaintiffs' discovery requests, and remain unproduced.

3. The Parties continue to collaborate and cooperate on these productions. The Parties have made substantial progress on production of these outstanding materials over the past approximately six weeks, with Defendants having made ten productions in that time.

4. The Parties are also continuing to confer as to efficient ways to streamline remaining discovery and to potentially narrow issues in dispute.

5. Given the nature of the materials requested and the topics about which the Parties are conferring, the Parties request and adjournment of the motion to compel deadline in the Case Management Order. Currently, the motion to compel deadline is March 14, 2025. The Parties jointly request that this deadline be adjourned to April 14, 2025. By the expiration of that deadline, or possibly with one additional extension, the Parties expect to be able to propose a near-final deadline for motions to compel and, hopefully, be able to report that no such motion will be needed.

6. The Parties also request small, three (3) day extensions of the remaining deadlines in the summary judgment briefing schedule set by the Court. The Parties request that the deadline for oppositions to summary judgment motions be adjourned from April 8, 2025, to April 11, 2025. The Parties further request that the deadline for replies in further support of motions for summary judgment be adjourned from May 8, 2025, to May 12, 2025. This request is necessitated by the fact that subsequent productions of materials and developments at meet and

confers between the Parties may impact the Parties' respective approaches to the two competing motions for summary judgment.

7. The Parties thank the Court in advance for its consideration of this request.

Dated: Buffalo, New York
March 13, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2025, the above Stipulation Motion for Adjournment of Court-Ordered Deadlines was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Peter A. Sahasrabudhe

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